AAMSF 1,4

All American Metal Finishing Site Visit Report

Business Owner: Mr. David Amlin, 5609 – 176th St. SW, Lynnwood, WA 98037 (206) 795-3817
Property Owner: Mr. Robert L. Brown, Tanglewood Island, Fox Island, WA 98333 (253) 549-2288 and (253) 549-3288
Small Business Administration Loan Holder: Celtic Bank, Salt Lake City, UT, c/o Mr. Brian Zurn 801-363-6500

Robert Reuter and Warren Walton met property owner Robert L. Brown on-site at 09:30 AM on October 14th, 2009. He let us into the building at 926 – 5th Aye S in Kent, Washington. The building is located approximately 1,000 feet north of the Green River (River Mile 24.0) at elevation of 44.0 feet. The drainage ditch behind the building (SE Corner) is at elevation 40.0 feet. The building contains equipment from a zinc plating facility. This included process chemicals and waste typical from this industrial process. We were joined at 10:00 AM by All American Finishing Company business owner, Dave Amlin.

The facility discontinued production on September 3rd, 2009. In addition, the company had not shipped waste in 2009. The company owner indicated that the Dangerous Waste drums were being managed under satellite accumulation standards prior to production shut-down. The Special Waste on-site appears to have exceeded the accumulation time limit of 180 days. We recommended that the facility request an extension for the Special Waste currently on-site and remove this material as soon as it is practicable. This includes removing all Special Waste from the Filter Press and re-packaging the material in DOT-Approved Containers prior to shipment. We cannot guarantee that the extension will be granted given the site proximity to the flood zone.

The facility was operated as a Large Quantity Generator. The accumulation start date for the process waste that designates as Dangerous Waste is September 3rd, 2009. Arrangements need to be made to remove all Dangerous Waste from the facility as soon as possible considering that the Howard Hansen Dam could release water above the flood stage at anytime during the winter rainy season (generally October through May). The waste is currently being stored in the process tanks and in the secondary containment areas. We informed the property owner and the company owner that it is important for them to remove all waste as soon as possible. While on-site we recorded the following information on the equipment and the waste being stored in it:

- 32 process tanks (approximately 21,620 gallons liquid)
    - Tank #1 -600 gallons 30% Muriatic Acid (below pH 2.0) D002
    - Tank #2 -700 gallons Muriatic Acid Rinse Tank (probably below pH 2.0) D002?
    - Tank #3 -700 gallons Metal Cleaner 9% Sodium Metasilicate (ph 14.0) D002
    - Tank #4 -700 gallons Metal Cleaner 9% Sodium Metasilicate (ph 14.0) D002
    - Tank #5 -700 gallons Metal Cleaner 9% Sodium Hydroxide (pH 14.0) D002
    - Tank #6 -700 gallons Metal Cleaner 9% Sodium Hydroxide (pH 14.0) D002
    - Tank #7 -700 gallons Metal Cleaner Rinse Tank (pH ??) above 0.01mol/l = pH 12.0 D002?
    - Tank #8 -700 gallons Metal Cleaner Rinse Tank (pH ??) above 0.01mol/l = pH 12.0 D002?

- Tank #9 -700 gallons Metal Cleaner Rinse Tank (pH ??) above 0.01mol/l = pH 12.0 D002?
- Tank #10-750 gallons 13% Muriatic Acid (below pH 2.0) D002
- Tank #11-750 gallons 13% Muriatic Acid (below pH 2.0) D002
- Tank #12-700 gallons Muriatic Acid Rinse Tank (probably below pH 2.0) D002?
- Tank #13-700 gallons Muriatic Acid Rinse Tank (probably below pH 2.0) D002?
- Tank #14-600 gallons Muriatic Acid Rinse Tank (probably below pH 2.0) D002?
- Tank #15-100 gallons Rinse Water (Tank is Labeled as 10% Sodium Hydroxide)
- Tank #16-1,600 gallons Zinc Plating Solution 1% Zinc, 12% Sodium Hydroxide D002
- Tank #16A-160 gallons Zinc Generation Tank 1% Zinc, 12% Sodium Hydroxide D002
- Tank #17-1,400 gallons Zinc Plating Solution 1.5% Zinc, 12% Sodium Hydroxide D002
- Tank #17A-160 gallons Zinc Generation Tank 1.5% Zinc, 12% Sodium Hydroxide D002
- Tank #18 -700 gallons Zinc Plating Rinse Tank (pH??, Zinc Content??) D002?, WT02?
- Tank #19 -700 gallons Zinc Plating Rinse Tank (pH??, Zinc Content??) D002?, WT02?
- Tank #20 -700 gallons Zinc Plating Rinse Tank (pH??, Zinc Content??) D002?, WT02?
- Tank #21 -700 gallons Nitric Acid Pre-Dip Solution 0.25% Nitric Acid (pH 1.0) D002
- Tank #22 -700 gallons TRI V 121 (Chrome III) 3% Solution mixed 24 gal into 800 gal. D002
- Tank #23 -700 gallons TRI V 121 (Chrome III) Rinse Tank D002?
- Tank #24 -700 gallons TRI V 121 (Chrome III) Rinse Tank D002?
- Tank #25 -700 gallons TRI V 121 (Chrome III) Yellow Converter - mixed as Tank #22 D002
- Tank #26 -700 gallons TRI V 121 (Chrome III) Yellow Converter Rinse Tank D002?
- Tank #27 -700 gallons TRI V 121 (Chrome III) Yellow Converter Rinse Tank D002?
- Tank #28 -700 gallons TRI V 121 (Chrome III) Yellow Converter Rinse Tank D002?
- Tank #29 -0 gallons Spray Rinse Tank (some residual salts)
- Tank #30 -800 gallons Zinc Chro Shield mixed 40 gal. into 800 gal. WT02?

- 5 Tanks in Wastewater Treatment and Evaporation Area (3) Sump Pump Tanks (2) (approximately 2,650 gallons)

  - Boil Down Tank 1,000 gallons (WT02?)
  - Settling Tank #1 750 gallons Sludge (WT02) and Liquid WT02?
  - Settling Tank #2 800 gallons Sludge (WT02) and Liquid WT02?
  - 2 – Sump Pump Tanks 100 gallons Consolidated Liquid WT02? D002?

- Filter Cake Waste (approximately 1,800 pounds)

  - 2 – Filter Units (Process Vessels #16 and #17) West End (100 gallons) D002
  - 1 Drum (55 gallons, 500 pounds) D002
  - 3 – 5 gallon Buckets full of Filters D002
  - Waste Filter Cake under Filter Units (20 gallons) D002

- WT02 (Special Waste Sludge) (approximately 5,280 pounds)

    - 2 - Super Sacks on Pallets (1,640 pounds each)
    - 5 - Drums (55 gallons, 500 pounds each)
    - 1 – Filter Press Full of Waste (55 gallons, 500 pounds)
    - Waste Sludge under Walkways in Plating Area (100 gallons) 1,000 pounds
    - Pressure Wash Water from cleaning Sump Area (Unknown)

- Off Specification Product (1,030 gallons)

    - 3 – 275 gallon Totes Metal Cleaner (2 – 275 gallons; 1 - 220 gallons) 770 gallons D002
    - 2 – 55 gallon Drums Liquid Caustic Soda (1 – 30 gallons; 1 – 40 gallons) 70 gallons WSC02
    - 2 – 55 gallon Drums Zinc Chro Shield (1 – 55 gallons; 1 – 35 gallons) 90 gallons WT02?
    - 2 – 55 gallon Drums Cold Dip TRI V 121 (1 - 55gallons; 1 -30 gallons) 85 gallons WT02?
    - 1 – 55 gallon Drum Yellow Converter (1 – 15 gallons) 15 gallons WT02?

- Product

    - 1 – 55 gallon Drum Sulfuric Acid (1 – 55 gallons)
    - 1 – 55 gallon Drum Liquid Caustic Soda (1 – 55 gallons)

There were also products on-site in aerosol cans and paint cans and some empty product containers that would require rinsing. The Photo Log of the equipment and waste is located on our network drive at Y:\Compliance Unit - Inspection Reports\DRAFTS\All American Metal Finishing Closure Assessment 10-14-09\All American Metal Finishing 10-14-09 PhotoLog.doc